

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Richmond Division

IN RE:	)	
	)	
JAMES LOUIS BLAND SR.	)	Case No. 21-32562-KRH
	)	Chapter 13
Debtor	)	
	)	
ATLANTIC BAY MORTGAGE	)	
GROUP, LLC.	)	
	)	
Movant	)	
	)	
v.	)	
	)	
JAMES LOUIS BLAND SR., et al.	)	
	)	
Respondents	)	

**DEBTOR’S RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY**

COMES NOW the Debtor, by counsel, and as and for Debtor’s Response to the above styled Motion for Relief From the Automatic Stay (“Motion”), states as follows:

1. The allegations contained in paragraphs 1, 2, 3, and 5 of the Motion are admitted.
2. The Debtor is without sufficient information to admit or deny the allegations contained in paragraphs 4 and 6 of the Motion, and therefore denies the same.

WHEREFORE, the Debtor respectfully requests that the Motion for Relief From the Automatic Stay be denied, and for such other relief as the Court deems appropriate.

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By: /s/ James E. Kane  
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**CERTIFICATE OF SERVICE**

I hereby certify that on December 6, 2021, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof.

/s/ James E. Kane

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